



June 23, 2011

TO: Phil Isenberg, Chair, and Members of the Delta Stewardship Council
Joe Grindstaff, Executive Director, Delta Stewardship Council

Re: Comments on the Fourth Draft of the Delta Plan

Thank you for providing the City of Antioch the opportunity to comment on the Fourth Draft of the Delta Plan. After reviewing the draft plan, Antioch has the following comments:

CHAPTER 3 – GOVERNANCE: IMPLEMENTATION OF THE DELTA PLAN

The Fourth Draft Delta Plan, Chapter 3, has been amended to state that Ministerial project under CEQA are not covered actions. Antioch supports this amendment. However, the City continues to suggest that the Council would be better served to require that General Plans be consistent with the Delta Plan and that General Plan amendments be forwarded to the Council for certification prior to adoption. Once a General Plan designation is adopted for a piece of property or area of land, the owner is entitled to an expectation that the land can be developed in accordance with the policies of the General Plan. Putting compliance with the Delta Plan on the "back end" at time of future discretionary application could seriously hinder the Council's ability to implement the Plan. In addition, this suggestion is more efficient for the Council and local agencies versus reviewing each discretionary application.

Thank you again for allowing the City of Antioch to provide comments on the Delta Plan. We look forward to working with the Council in helping to develop future Plans.

Sincerely,

A handwritten signature in black ink, appearing to read "P. Harrington".

Phillip Harrington
Director of Capital Improvements/Water Rights